

Kodiak/Aleutians Subsistence Regional Advisory Council

c/o Office of Subsistence Management
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RAC 19010.ZS

MAR 06 2019

Reed Morisky, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Re: Kodiak Aleutians Subsistence Regional Advisory Council Comments on 2018-2019
Statewide Finfish Proposals 161 and 162

Dear Chairman Morisky,

I write to you on behalf on the Kodiak/Aleutians Subsistence Regional Advisory Council (Council). The Council wishes to submit its comments on Alaska Board of Fisheries (BOF) 2018-2019 Statewide Finfish Proposals 161 and 162 to be discussed at the Alaska BOF meeting on March 9-12, 2019. The Council deliberated these issues on the record during its fall 2018 public meeting held on October 15-16, 2018, in Anchorage.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Kodiak/Aleutians Region.

The Councils were established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter established the Council's authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside of its region that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

Chairman Morisky

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Cc: Federal Subsistence Board
Kodiak/Aleutians Subsistence Regional Advisory Council
Thomas Doolittle, Acting Assistant Regional Director,
Office of Subsistence Management
Jennifer Hardin, PhD., Subsistence Policy Coordinator,
Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Greg Risdahl, Fisheries Division Supervisor, Office of Subsistence Management
Robbin La Vine, Acting Supervisor, Anthropology Division, Office of Subsistence
Management
Katerina Wessels, Acting Council Coordination Division Chief,
Office of Subsistence Management
Zachary C. Stevenson, Subsistence Council Coordinator,
Office of Subsistence Management
March Burch, Wildlife Biologist IV, Alaska Department of Fish and Game
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record

Proposal 161

5 AAC 01.XXX, 5 AAC 75.XXX, 5 AAC, 7.XXX. New Section.

Require weekly reporting of salmon harvest by all permit or license holders.

Council recommendation: Oppose

Council comments: The Council opposed Statewide Finfish Proposal 161, stating that a 24-hour reporting period is not reasonable for the region. It would cause undue hardship for remote subsistence users in the Kodiak/Aleutians Region and does not support the current salmon management system in the region based on escapement. In the Council's opinion, the requirement of weekly reporting of salmon harvest by all permit or license holders should be only for specific areas and not for the whole State. Some communities do not even have an ADF&G representative, which makes it difficult to obtain fishing permits.

Proposal 162

5 AAC 01.XXX - 5 AAC 77.XXX. New section.

Require biweekly reporting of all sport, personal use, and subsistence king salmon catch.

Council recommendation: Oppose

Council comments: The Council opposed Statewide Finfish Proposal 162, stating the proposal should be area specific, does not apply to the region, and would result in undue hardship for the region.

The Council is sharing this letter with the BOF and the Federal Subsistence Board to emphasize the importance of these issues to the needs of the people of the Kodiak/Aleutians region. Any questions regarding this letter can be addressed directly to me through our Subsistence Council Coordinator, Zachary C. Stevenson, at (907) 786-3674 or zachary_stevenson@fws.gov.

Sincerely



Della Trumble, Chair
Kodiak/Aleutians Subsistence Regional
Advisory Council